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14 *Attorneys for Defendants*, BIOMET, INC.,
14 BIOMET ORTHOPEDICS, LLC, F/K/A
15 BIOMET ORTHOPEDICS, INC., DJO
15 GLOBAL, INC.; and ENCORE MEDICAL,
16 L.P. D/B/A DJO SURGICAL

17 UNITED STATES DISTRICT COURT

18 DISTRICT OF NEVADA, NORTHERN DIVISION

20 DEBRA GREGOIRE,

21 Plaintiffs,

22 vs.

23 BIOMET, INC., BIOMET ORTHOPEDICS,
23 LLC, F/K/A BIOMET ORTHOPEDICS,
24 INC., DJO GLOBAL, INC.; and ENCORE
25 MEDICAL, L.P. D/B/A DJO SURGICAL,
25 and DOES 1 500,

26 Defendants.

CASE NO. 3:20-cv-00077-MMD-CLB

STIPULATION AND ORDER TO
CONTINUE CASE MANAGEMENT
CONFERENCE AND CASE
MANAGEMENT REPORT

28 / / /

4817-0552-9027.1

1 COMES NOW Defendants BIOMET, INC., BIOMET ORTHOPEDICS, LLC, F/K/A
2 BIOMET ORTHOPEDICS, INC., DJO GLOBAL, INC. and ENCORE MEDICAL, L.P.
3 D/B/A DJO SURGICAL and Plaintiff, DEBRA GREGOIRE, by and through their
4 undersigned counsel of record and hereby stipulate and agree to continue the parties
5 Case Management Conference currently schedule for Thursday July 23, 2020, at 11:00
6 and Case Management Report currently due on or about July 16, 2020, by thirty days
7 (30) days or to date convenient for the Court.

Reason for Continuance

9 In accordance with the Court's Order Setting Case Management Conference (Doc.
10 42), the Parties held a discovery-planning conference by telephone on July 13, 2020.
11 Under the Court's current Order, the Case Management Report is due July 16, followed
12 by the Case Management Conference on July 23, which requires lead counsel for each
13 side to appear by video. (Order; Doc. 42 at 1:18-19).

14 Defendants' lead counsel (Mr. Swayze) underwent total joint replacement surgery
15 on June 29, 2020. Mr. Swayze respectfully seeks thirty (30) days to navigate his post-
16 surgical medical care during the current COVID-19 crisis to ensure his speedy and
17 complete recovery. Additionally, the delays associated with information gathering and
18 client communications during COVID-19 have been substantially impaired and additional
19 time is respectfully requested.

20 Plaintiff and Defendants' counsel have discussed the situation and stipulate to
21 continue this matter's current deadlines as follows:

Original Deadline

- Case Management Report: July 16, 2020
- Case Management Conference: July 23, 2020

Proposed Deadline

- Case Management Report: August 14, 2020
- Case Management Conference: August 24, 2020

1 **ORDER**

2 IT IS SO ORDERED.

3 Dated this __ day of _____, 2020.

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5 U.S. DISTRICT COURT JUDGE

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